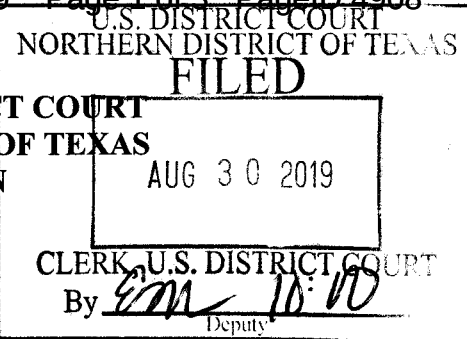


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



American Airlines, Inc.,

Plaintiff,

v.

Transport Workers Union of
America, AFL-CIO, International
Association of Machinists and
Aerospace Workers, and Airline
Mechanic and Related Employee
Association TWU/IAM,

Defendants.

Civil Action No. 4:19-CV-00414-A

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE OPPOSITION TO MOTION FOR CONTEMPT**

Defendants Transport Workers Union of America, AFL-CIO ("TWU"), International Association of Machinists and Aerospace Workers ("IAM"), and Airline Mechanic and Related Employee Association TWU/IAM ("Association") (collectively, the "Defendants") herby move this Court to extend Defendants' time to respond to American's motion for contempt sanctions [Doc. 134] by 14 days. In support of this Motion, Defendants state the following:

1. American filed its motion on August 13, 2019. Pursuant to Local Rule 7.1, Defendants' Opposition is currently due on Tuesday, September 3, 2019.
2. American's motion relies on numerous factual Declarations as well as an expert witness report.
3. The requested two-week extension of time would allow Defendants the opportunity to more fully respond to the facts and issues raised in American's motion.

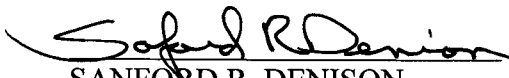
4. No hearing has been scheduled in this matter, and the requested extension would not affect any other deadlines in this proceeding.

5. Counsel for the Defendants has conferred with counsel for Plaintiff, who stated that American Airlines does not oppose the relief requested.

WHEREFORE, Defendants respectfully request that the date for the filing of their Opposition to American's Motion for Contempt Sanctions be extended to September 17, 2019.

Dated: August 29, 2019

Respectfully Submitted,



SANFORD R. DENISON
(Tex. Bar No. 05655560)
Baab & Denison, LLP
6301 Gaston Ave., Suite 550
Dallas, TX 75214
Tel.: (214) 637-0750
Fax.: (214) 637-0730
Email: denison@baabdenison.com

Attorneys for Defendants

MARK RICHARD (*pro hac vice*)
(Florida Bar No. 305979)
OSNAT K. RIND (*pro hac vice*)
(Florida Bar No. 958698)
CHRISTINA S. GORNAIL (*pro hac vice*)
(Florida Bar No. 085922)
LUCIA PIVA (*pro hac vice*)
(Florida Bar No. 305979)
Phillips, Richard & Rind, P.A.
9360 SW 72nd Street, Suite 283
Miami, FL 33173
Tel.: (305) 412-8322
Fax.: (305) 412-8299
Email: mrichard@phillipsrichard.com
Email: orind@phillipsrichard.com
Email: cgornail@philipsrichard.com
Email: lpiva@philipsrichard.com

*Attorneys for Defendants Transport Workers
Union of America, ALF-CIO and Airline
Mechanic and Related Employee Association TWU/IAM*

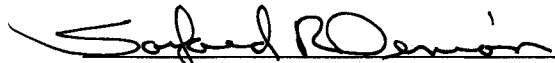
JEFFREY A. BARTOS (*pro hac vice*)
(D.C. Bar No. 435832)
ANTONIA BIRD (*pro hac vice*)
(Maryland Bar No. 1712130046)
Guerrieri, Bartos & Roma, P.C.
1900 M Street, N.W., Suite 700
Washington, DC 20036
Tel.: (202) 624-7400
Fax.: (202) 624-7420
Email: jbartos@geclaw.com
Email: abird@geclaw.com

*Attorneys for Defendants International
Association of Machinists & Aerospace
Workers and Airline Mechanic and Related
Employee Association TWU/IAM*

CERTIFICATE OF CONFERENCE

The undersigned counsel for Defendants is advised and certifies that on August 29, 2019 Jeff Bartos, co-lead counsel for Defendants, conferred by telephone with Robert Siegel, lead counsel for Plaintiff, who indicated that Plaintiff does not oppose the grant of the requested two-week extension through and including September 17, 2019 for Defendants to respond to Plaintiff's motion for contempt sanctions [Doc. 134].

Signed this 29th day of August, 2019.


SANFORD R. DENISON

CERTIFICATE OF SERVICE

I certify that on this 29th day of August, 2019 a true and correct copy of the foregoing document was served on counsel for all parties of record by a means permitted by Rule 5(b)(2) of the Federal Rules of Civil Procedure ("F.R.C.P.").


SANFORD R. DENISON